

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7171

WRITER'S INTERNET ADDRESS
petercalamari@quinnemanuel.com

March 24, 2014

VIA ECF

Hon. Ronnie Abrams
U.S. Dist. Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Residential Funding Company, LLC v. SunTrust Mortgage, Inc.*,
No. 13-cv-8938 (RA)

Dear Judge Abrams:

We represent Plaintiff Residential Funding Company, LLC ("RFC"), and write in response to Defendant's letter dated March 21, 2014 (Dkt. No. 27). In its letter, Defendant consents to the designation of this action as related to the actions *Residential Funding Company v. Columbia Home Loans, LLC*, No. 13-cv-8867 (RA), and *Residential Funding Company v. GreenPoint Mortgage Funding, Inc.*, No. 13-cv-8937 (PKC).

RFC again respectfully states that this action, and the others listed above, should be referred to the Bankruptcy Court for this District pursuant to this District's Amended Standing Order of Reference, M10-468, as will be shown in the briefing as directed by this Court. Although irrelevant to that referral, RFC also notes that, contrary to Defendant's assertion, individualized loan-by-loan proof will not be required in this action. *See e.g., Assured Guar. Mun. Corp. v. Flagstar Bank, FSB*, 920 F. Supp. 2d 475, 512 (S.D.N.Y. 2013) ("Sampling is a widely accepted method of proof . . . including in cases relating to RMBS and involving repurchase claims."). In any event, the Bankruptcy Court's familiarity with the facts and circumstances underlying this action, and its reservation of exclusive jurisdiction as to the claims at issue here, makes it the most efficient forum for resolving this action.

Respectfully submitted,

/s/ Peter Calamari

Peter E. Calamari

Cc: All Counsel (via e-mail)

quinn emanuel urquhart & sullivan, llp

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